

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

JIDONG ZHANG,

§

Plaintiff,

§

vs.

§

CASE NO. CIV-16-1044-SLP

TIPTOP ENERGY PRODUCTION  
U.S., LLC, a limited liability company,

§

Defendant.

§

§

§

**JOINT MOTION TO STAY UNEXPIRED SCHEDULING ORDER DEADLINES**

Plaintiff Jidong Zhang and Defendant Tiptop Energy Production U.S., LLC (collectively, “the Parties”) move the Court to stay the unexpired deadlines contained in the Court’s Scheduling Order (Dkt. No. 21). In support of the motion, the Parties state as follows:

1. Defendant moved for summary judgment on January 8, 2018 on all of Plaintiff’s claims.

2. The Court’s Scheduling Order provides that “[t]he parties may move to stay unexpired scheduling order deadlines pending the Court’s ruling on dispositive motions. Scheduling Order ¶ 7.

3. For purposes of judicial efficiency and pursuant to the Scheduling Order, the Parties ask the Court to stay (and reset if later necessary) the unexpired deadlines pending the resolution of Defendant’s motion for summary judgment.

4. This motion is not made for purposes of delay, but rather in the interest of justice.

**JOINT MOTION TO EXTEND STAY OF CASE DEADLINES — Page 1**

5. For these reasons, the Parties pray that the Court grant their Joint Motion to Stay Unexpired Scheduling Order Deadlines and that the Court reset the trial date following resolution of Defendant's motion for summary judgment

Dated: January 8, 2018.

Respectfully submitted,

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**Attorneys for Defendant Tiptop Energy Production U.S., LLC**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was served via the Court's electronic case filing system on this 8th day of January, 2018, on all counsel of record as listed below:

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*/s/ Marc H. Klein*  
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